REMARKS

Applicant appreciates the Examiner's review of the present application and requests reconsideration based on the amendments presented and the following remarks. Claims 1 has been amended to more clearly be directed to statutory matter. Claim 2 is amended to more clearly recite limitations to claim 1. Claims 1 - 17 are pending in the present application. The specification has been amended to include drawing characters not mentioned in the description. Support for these amendments is found throughout the specification with particular reference to the figures. Applicant respectfully submits that no new matter has been added.

Drawing Objections

The Examiner objected to the drawings as failing to comply with 37 CFR 1.84(p)(5) because they include characters not mentioned in the description. Applicant has amended the specification to include reference to the characters: Items 20, 36, 38, 40, 54, 148 and 196. Applicant respectfully submits that the drawing objection be withdrawn.

Rejections Under 35 U.S.C. § 101

Claims 1 – 9 were rejected under 35 U.S.C. § 101

The Examiner rejected claims 1 – 9 under 35 U.S.C. § 101 with the assertion that the claimed invention is directed to non-statutory subject matter. The Examiner stated that the system can be entirely embodied in software per se and software is considered to represent non-statutory subject matter. Applicant disagrees with the Examiner's rejection and characterization. Nonetheless, claim 1 is amended herewith and Applicant respectfully submits that claim 1, and claims 2-9 that depend from claim 1, are now more clearly directed to statutory subject matter.

Claim 1 as amended recites "a processor interconnected with said database." As one skilled in the art appreciates that a database, as previously recited, cannot be "entirely embodied in software per se," so too would one skilled in the art appreciate that this processor as particularly described and claimed cannot be entirely embodied in software per se and therefore

statutory subject matter. Applicant requests that the rejection under 35 U.S.C. §101 be withdrawn.

Rejections Under 35 U.S.C. §103

Claims 1 – 7, 10 – 13 and 15 – 17 were rejected under 35 U.S.C. § 103(a)

The Examiner rejected claims 1 – 7, 10 – 13 and 15 – 17 under 35 U.S.C. §103(a) as being unpatentable over US Publication 2004/0186821 to Matson et al. (hereinafter referred to as "Matson"), and in view of US Patent No. 6,105,030 to Syed et al. (hereinafter referred to as "Syed"). Neither Matson nor Syed alone or in combination teach or suggest all of the limitations of the presently claimed invention. Applicant respectfully traverses the rejections.

Independent claim 1 recites a system for processing incoming data and inserting said incoming data into a database. This system includes a processor that has an incoming data receiving component, a parsing component, a loader component and a data sorting component. The parsing component receives and parses the incoming data as a function of a plurality of fields. The loader component is in communication with the parsing component and sorts parsed data into a plurality of temporary tables as a function of the plurality of fields. The data sorting component is in communication with the plurality of temporary tables and with the database, to access sorted data in the plurality of temporary tables, and to re-sort the sorted data into a plurality of tables in the database to which the processor is interconnected.

Independent claim 10 recites a method for loading data into a database. The method includes receiving data from a source of data; parsing the data as a function of a plurality of fields to form parsed data; sorting the parsed data into a plurality of temporary tables, the tables being a function of the plurality of fields, to form sorted data; and re-sorting and inserting the sorted data in tables in the database.

Matson teaches a method and system for importing data. The steps include downloading of product data from different sources, processing the data, reviewing the results and comparing to detect differences in the data which are errors. The method also includes the steps of

connecting the data from its supplier specific format into a standard format, comparing the data, categorizing the data based on the results of the second comparison, and processing each category to update the database (see, Abstract).

Contrary to the Examiner's suggestions, Matson discloses a completely different data processing system and fails to teach, suggest or disclose the features of claim 1 and claim 10. Applicant respectfully submits that the referenced portions of Matson do not disclose the elements of claim 1 and 10, as discussed below.

Specifically, Matson does not disclose or suggest a parsing component that works with a loader component to "receive and parse said incoming data...and to sort said parsed data into a plurality of temporary tables as a function of said plurality of fields...". Rather, Matson discloses parsing (a common term in data processing) fields of a supplier data file to convert the data file into an XML file having each of the fields "parsed from the input file and stored as separate elements in the [same] supplier XML file" [0037]. In Matson, the fields are not sorted into a plurality of temporary tables as a function of the fields, as in Applicants' claims 1 and 10. In Matson, the XML file is not "split into a plurality of files" as asserted by the Examiner.

In the Office Action, the Examiner erroneously asserted that Matson discloses sorting parsed data as a function of said plurality of fields and that an XML file is split into a plurality of files. (Office Action, Pages 4-5 and Page 7). Actually, paragraph 40 of Matson teaches that a comparison is done with the XML file having the parsed data and that this differential analysis results in differences that are then categorized or split into separate data files for statistical analysis. The data files into which the input data are split include the identical products data file, the new products data file, the changed products data file, the deleted products data file, the faulty products data file, and the analysis statistics data file. See [0041] of Matson.

Applicant respectfully submits that contrary to the Examiner's assertion, the referenced portion of Matson, paragraph 41, does not contain the teachings of the present application. Matson fails to teach or suggest sorting parsed data into a plurality of temporary tables as a function of said plurality of fields. Matson makes no mention of temporary tables such as

Applicants particularly claim. Instead, Matson merely describes the different files into which differences between files having input data are split. The input data of Matson is not being sorted as a function of said plurality of fields.

The Examiner further erroneously suggested that the claimed data sorting component is the data load technician disclosed in Matson. Additionally, the Examiner stated that paragraph 59 through paragraph 60 of Matson teaches a "data sorting component in communication with said plurality of temporary tables and with said database, to access sorted data in said plurality of temporary tables, and to re-sort data into a plurality of tables in said database." (Office Action, Pages 4-5 and Page 7)

Contrary to the Examiner's assertion, paragraphs 59 through 60 teach that once the data is categorized by differential analysis (splits input data into separate data files), a data load technician reviews the data to "review analysis results." Thereafter the differential analysis data can be inserted, updated or deleted from the database *See [0059-60] of Matson.*

Applicant respectfully submits that contrary to the Examiner's assertion, the referenced portion of Matson, paragraphs 50 through 60, do not disclose or suggest the features of Applicant's invention as recited in claims 1 and 10. Matson, among other things, fails to teach or suggest a data sorting component <u>that is in communication with said plurality of temporary tables and with said database</u>, to access sorted data in said plurality of <u>temporary tables</u>, and to <u>re-sort data into a plurality of tables in said database</u>. Instead, Matson merely describes that a technician reviews the data for quality purposes.

Additionally, the Examiner admitted that "Matson fail[sic] to explicitly disclose the further limitation of sorting the parsed data into a plurality of temporary tables." (Office Action, Page 5 and Page 7). Thus, Matson fails to disclose several limitations of Applicant's claimed invention. However, the Examiner cited Syed as making up for the deficiencies of Matson.

Nothing in Syed cures the deficiencies of Matson. Like Matson, Syed fails to teach or suggest sorting <u>parsed data into temporary tables</u> as a <u>function of said plurality of fields</u>. Also

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like Matson, Syed fails to teach or suggest a data sorting component that is in communication with said plurality of temporary tables and with said database, to access sorted data in said plurality of temporary tables, and to re-sort data into a plurality of tables in said database.

The Examiner indicated that Syed "discloses temporary tables, including the further limitation of sorting the parsed data into a plurality of temporary tables (see column 5, lines 21-27) in order to increases[sic] efficiency by avoiding feeding data into a data import process without having a thorough understanding of data beforehand." (Office Action, Page 5 and Page 7). Syed discloses obtaining a snapshot of a table or database to obtain data in order of produce a consistent copy of a table or database. Syed does not disclose temporary tables or sorting parsed data into a plurality of temporary tables. Even if Syed disclosed temporary tables as required by Applicant's invention, Syed would not cure the other deficiencies of Matson.

Claims 2 - 7 depend from claim 1 and claims 11 – 13, and 15 - 17 depend from claim 10. For the reasons above these claims are patentable over Matson in view of Syed. Although Claims 2 – 7 depend from claim 1 and claims 11 – 13 and 15 – 17 depend from claim 10, the Examiner has addressed several dependent claims. Several of the claims dependant on claims 1 and 10 are addressed below.

With respect to claims 2 and 11, the Examiner cited column 5, lines 21 – 27 of Syed as disclosing loading said file into said temporary table in said database. (Office Action, Page 6 and Page 8). Syed discloses taking a snapshot of a database, not creating a temporary table. Nothing in Syed discloses loading a file into a temporary table in a database. Additionally, claims 2 and 5 of applicant's claimed invention require deactivating access to a temporary table. The examiner stated that Syed, column 5, lines 19 – 20 and lines 28 – 29 disclose deactivating and reactivating access to a temporary table. (Office Action, Page 6 and Page 8). Syed discloses locking a desired table and then the coordinator can take a snapshot, then unlocking desired table. Syed does not teach or suggest deactivating or reactivating access to a temporary table.

With respect to claims 5, 6, 15, and 16 the Examiner cited Paragraph 38 of Matson as disclosing the limitation "wherein at least one specific function is implemented into a specific

parsing component which encapsulates said generic parsing component, said at least one specific function modifying functionality of said generic parsing component so that said specific parsing component can parse data in a specific format." (Office Action, Page 6, see also Page 9). The Examiner also cited paragraph 38 as disclosing the system "wherein said at least one specific function overrides corresponding functionality in said generic parsing component." (Office Action, Page 6 and Page 9). Paragraph 38 teaches that "parsing product attributes from descriptions using regular expression matching" can be done at different stages and that certain product attributes should be constructed if possible, such as short descriptions. Neither Matson nor Syed disclose or suggest that one specific function is implemented into a specific parsing component which encapsulates the generic parsing component or that at least one specific function modifying functionality of said generic parsing component so that said specific parsing component can parse data in a specific format. Additionally, neither Matson nor Syed disclose such a system wherein at least one specific function overrides corresponding functionality in the generic parsing component. *See [0038] of Matson.*

With respect to claim 7 and claim 17, the Examiner cited Matson, paragraph 23 as disclosing the system "wherein said data sorting component processes date in terms of one of: transaction data . . . line item data, additional data, enhanced data, trip leg data, and card balanced data. (Office Action, Page 7 and Page 9). Applicant respectfully submits that Matson does not disclose these limitations. Matson, in a completely different data processing system, describes that the data may include "legacy systems data streams, real-time data feeds, archived data media, flat files which are text delineated and/or comma delineated, and database files. Neither Matson nor Syed disclose sorting data in terms of line item data, additional data, enhanced data, trip leg data or card balanced data, in a system such as Applicants particularly claim. *See [0023] of Matson.*

Accordingly, neither Matson nor Syed, alone or combined, teach or suggest each and every element of claims 1 – 7, 10 – 13 and 15 – 17. Further, without resorting to the use of impermissible hindsight, persons having ordinary skill in the art would not be motivated to combine Matson and Syed arrive at the systems and methods claimed in the aforementioned

claims. Therefore, Applicant respectfully submits that claims 1 – 7, 10 – 13 and 15 – 17 are patentable and are in condition for allowance.

<u>*Claims 8, 9 and 14 were rejected under 35 U.S.C. § 103(a)*</u>

Claims 8, 9 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Matson in view of Syed in further view of U.S. Patent No. 6,633,878 to Underwood (hereinafter referred to as "Underwood"). None of Matson, Syed, or Underwood, alone or in combination, teach or suggest all of the features of the present invention.

Regarding claim 8, Applicant's invention requires in addition to the limitation of claim 1, as discussed above, that the data is transactional data representing transactions completed using a commercial credit card. The Examiner stated that Matson/Syed "discloses transactions, however, Matson/Syed fails to explicitly disclose the further limitation wherein said data is transactional data represented transaction completed using a commercial credit card." The Examiner also stated that "Underwood discloses initializing an ecommerce database framework, including the further limitation wherein said data is transactional data representing transactions completed using a commercial credit card." (Office Action, Page 10). Contrary to the Examiner's suggestion, Matson in view of Syed does not disclose the transaction required by the dependent claim in a system as discussed above with reference to independent claim 1. Furthermore, contrary to the Examiner's characterization of Underwood at column 107, lines 56 – 61, Underwood fails to disclose that the transaction data represents transactions using a commercial credit card. Underwood, discloses that one may need to encrypt data such as data including credit card information. Underwood, does not disclose that the transaction data <u>represents transactions</u> using a commercial credit card. Accordingly, none of Matson, Syed, or Underwood or any combination thereof, disclose all of the claim limitations of claim 8.

Referring to claim 9, Applicant's invention requires all of the limitations of claim 8 which depends from claim 1, including the further limitation that the data sorting component includes additional information in the data tables regarding tax information for said transactional data. The Examiner stated that "the combination of Matson/Syed and Underwood at column 116, lines 7-17 discloses the system of claim 8 wherein said data sorting component includes

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additional information in said data tables regarding tax information of said transactional data. (Office Action, Page 10). As previously discussed, Matson in view of Syed does not disclose the transaction required by dependent claim 9 as discussed above with reference to independent claim 1 and dependent claim 8 from which claim 9 depends. Accordingly, none of Matson, Syed, or Underwood, or any combination thereof, disclose all of the claim limitations of claim 9.

Regarding claim 14, Applicants' invention requires in addition to the limitation of claim 10, as discussed above, the data is credit card transaction data. The Examiner stated that Matson/Syed "discloses transactions, however, Matson/Syed fails to explicitly disclose the further limitation wherein said data credit card data." The Examiner also stated that "Underwood discloses initializing an ecommerce database framework, including the further limitation wherein said data is credit card transaction data." (Office Action, Page 10). Contrary to Examiner's suggestion, Matson in view of Syed does not disclose the transaction required by dependent claim 14 as discussed above with reference to independent claim 10.

Accordingly, none of Matson, Syed, or Underwood, or any combination thereof, disclose all of the claim limitations of claim 8, 9 or 14. Further, without resorting to the use of impermissible hindsight, persons having ordinary skill in the art would not be motivated to combine Matson, Syed and/or Underwood and arrive at the systems and methods claimed in the aforementioned claims. Therefore, Applicant respectfully submits that claims 8, 9 and 14 are patentable and are in condition for allowance.
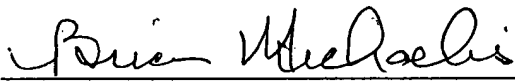
CONCLUSION

In view of the above, reconsideration and allowance of this application are believed to be in order, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below. The Examiner is invited and encouraged to telephone the undersigned with any concerns in furtherance of the prosecution of the present application.

Please charge any deficiency as well as any other fee(s) which may become due at any time during the pendency of this application, or credit any overpayment of such fee(s) to Deposit Account No. 50-0369. Also, in the event any extensions of time for responding are required for the pending application(s), please treat this paper as a petition to extend the time as required and charge Deposit Account No. 50-0369 therefor.

Respectfully submitted,

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